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Proposed Bankruptcy Counsel for
Debtor and Debtor-In-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

In re)	Case No.	17-04535-CL11
)		
BULL TACO, LLC)	Chapter 11	
)		
Debtor and)	DECLARATION OF GREG	
Debtor-In-Possession.)	LUKASIEWICZ IN SUPPORT OF FIRST	
)	DAY MOTION FOR INTERIM ORDER	
)	AUTHORIZING USE OF CASH	
)	COLLATERAL AND RELATED RELIEF	
)		
)	Date:	
)	Time:	
)	Dept.: 5, Room 318	
)	Judge: Hon. Christopher B. Latham	
)		

DECLARATION OF GREG LUKASIEWICZ

I, Greg Lukasiewicz, declare as follows:

1. I am the President and holder of 100% of membership interests in Bull Taco, LLC (the "Debtor" or "Debtor-In-Possession") in case number 17-04535-CL11, a chapter 11 case filed in the United States Bankruptcy Court for the Southern District of California (the "Bankruptcy Case").

I am making this declaration in support of the Debtor's First Day Motion for Interim Order Authorizing Use of Cash Collateral and Related Relief (the "Motion"). The matters set forth herein are personally known to me to be true, except those matters set forth on information and belief; and

1 as to those matters, I am informed and believe them to be true. If called upon to do so, I could and
2 would competently testify to the truth of the matters set forth herein.

3 2. The Debtor is a California limited liability company and restaurant operating out of
4 two locations: (i) 2050 S. Coast Hwy. 101, Cardiff, CA 92007; and (ii) 101 North Coast Hwy. 101,
5 Encinitas, CA 92024.

6 3. I own all membership interests of the Debtor.

7 4. The Debtor's use of cash collateral is necessary to maintain its present value and
8 condition of its bankruptcy estate, because the Debtor must make ongoing payments to sustain its
9 business and pay its employees.

10 5. Any inability to use funds and cash collateral during its chapter 11 case could
11 essentially shut down the business of the Debtor and make its reorganization efforts in bankruptcy
12 impossible.

13 6. Prior to the filing of the Bankruptcy Case, I attempted to identify all potential secured
14 creditors which may have interest in the Debtor's cash collateral.

15 7. As a result of those efforts, the following four (4) creditors were identified as those
16 which had filed UCC financing statements: (i) Sysco San Diego, Inc. ("Sysco"), via UCC filed
17 February 23, 2012; (ii) Jamroc, Inc. ("Jamroc"), via UCC filed January 9, 2014; (iii) Prosperity, via
18 UCC filed April 1, 2014; and (iv) Strategic Funding Source, Inc. ("Strategic"), via UCC filed April
19 27, 2015.

20 8. I have had discussions with David DaCosta, Chief, Chief Executive Officer of Jamroc
21 regarding Bull Taco's use of cash collateral.

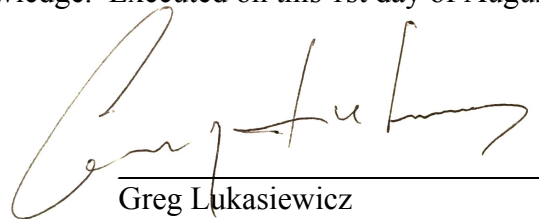
22 9. Mr. DaCosta has informed me that he would not oppose the Debtor's use of cash
23 collateral or require any adequate protection with said use.

1 10. In the Debtor's normal course of business, it requires cash on hand and cash flow
2 from its income and accounts receivable in order to make payments for necessary expenses and to
3 compensate its employees.

4 11. Those necessary expenses include those for food and produce, payroll, advertising,
5 sales tax payments, utilities, and other various expenses required for the operation of a successful
6 restaurant.

7 12. The Budget attached to the Motion as **Exhibit B** is a true and correct copy of the
8 estimated budget for the Debtor.
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10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct to the best of my knowledge. Executed on this 1st day of August, 2017,
12 at San Diego, California.

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Greg Lukasiewicz